

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

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FTX TRADING LTD., WEST REALM SHIRES SERVICES, INC., and ALAMEDA RESEARCH LTD.,

Plaintiffs,

- against -

MIRANA CORP., BYBIT FINTECH LTD., TIME RESEARCH LTD., SIN WEI "SEAN" TAN, WEI LIN "GERMAINE" TAN, WEIZHENG YE, and NASHON LOO SHUN LIANG,

Defendants.

Adv. Pro. No. 23-50759 (JTD)

**DECLARATION OF JONATHAN MARSHALL  
IN SUPPORT OF PLAINTIFFS' MEMORANDUM OF LAW IN OPPOSITION TO  
DEFENDANTS' MOTIONS TO DISMISS PLAINTIFFS' COMPLAINT**

I, Jonathan Marshall hereby declare that the following is true and correct to the best of my knowledge, information and belief:

1. I am a Managing Director of Alvarez and Marsal Disputes and Investigations, LLC (A&M) and head of the North America Forensics Technology Solutions practice. A&M

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<sup>1</sup> The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification numbers are 3288 and 4063, respectively. Due to the large number of debtor entities in these Chapter 11 cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson's Commercial Complex, Friars Hill Road, St. John's, Antigua and Barbuda.

serves as financial advisor to FTX Debtors and have been designated as a custodian of certain records for FTX Debtors for the purpose of responding to government agencies, government subpoenas, claimants, investigators, and to the FTX estate for the ongoing bankruptcy proceedings. A&M received sanitized (as described below) copies of database snapshots from Sygnia, FTX's retained Cyber Security firm, for the FTX.com and FTX US exchange environments. The environments contain a database called "FTX" which in turn contains multiple schemas. The primary schema, "public," contains approximately 400 tables which were used to run the exchange. Absent from these shared snapshots were approximately 5 - 10 tables which Sygnia deemed as containing highly sensitive information, such as customer security keys and private wallet keys. In addition to the FTX.com and FTX US snapshots, A&M also received a copy of the FTX.com and FTX US orders database. Together the FTX.com and FTX US snapshots and the FTX.com and FTX US order database are referred to herein as the "FTX databases." A&M maintains 'read-only' copies of the FTX databases as replica copies as they were stored in the normal course of business by FTX, with the exception of the highly sensitive information removed by Sygnia referenced above. A&M has taken the following actions, among others:

1. Interviewed key pre-petition FTX data science personnel and engineers with knowledge of database structures, contents, and available balance calculation code, which was used when FTX.com was operational.
2. Identified and reviewed source code files and resources needed to create, run, and maintain the FTX.com and FTX US exchanges. While operational, it is my understanding that this code was used to calculate customer balances and periodically stored the results in the FTX databases. The Debtors engaged with the remaining FTX data science

and engineering team to understand, run, and generate outputs from the database.

3. Compared the outputs against available historical exchange snapshots, and used various techniques to seek to validate the accuracy and completeness of the outputs.

2. Based on my personal knowledge arising out of the experiences and interactions described above, including information provided to me by my team and by others at FTX Debtors and their advisors, I am familiar with FTX Debtors' record keeping practices, FTX Debtors' record keeping systems during the period of time covered by the documents identified below, the manner in which FTX Debtors' records are created, stored and maintained, and the manner by which FTX Debtors made, kept, and used such documents.

3. The transaction records reflected in Exhibits 1 – 3 were gathered from the FTX Debtors' computer systems and provided to counsel for the FTX Debtors. To the best of my knowledge, the transaction records reflected in the Exhibits are true and accurate excerpts from the transactional records contained within the FTX databases maintained by the FTX Debtors.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief. Executed on April 8, 2024.



Jonathan Marshall